S & C Oil Co., Inc.

4952 Warner Avenue, Suite 223 Huntington Beach, CA 92649-5505 714.840.0751 phone 714.840.6751 fax

Ms. Maryam Taidy Los Angeles Regional Water Quality Board 320 West 4th Suite 200 Los Angeles CA, 90013 RE: Pauley Lease sump, Case No. OG92649 CALIFORNIA REGIONAL WATE OUALITY CONTROL BOARD LOS ANGELES REGION

Dear Ms Taidy,

Description of Disposal Methods and Destinations: S & C Oil Co. Inc. and/or its affiliates have not drilled any wells since they have owned and/or operated the Pauley site and thus no fluids from the drilling process were put into the sump.

Produced water generated as a part of lease oil production is transferred to Oil Operators Incorporated via pipeline for treatment offsite. Water is then transferred from OOI to DOGGR permitted injection wells owned by others, and/or transferred via pipeline to a POTW (Publically Owned Treatment Works), LA County Sanitation District. The volume of produced water for S & C Oil Co. operations has averaged approximately 265,829 barrels per year over the last 10 years.

Crude oil produced by S & C operations is sold with a custody transfer at the lease site. The oil is trucked offsite for delivery to a refinery by others (Not by S & C). The volume of crude oil produced by S & C has averaged approximately 9,805 barrels per year over the last 10 years.

Volumes of Fluids: The volume of water and oil produced was based upon S & C records as reported to the California Department of Conservation, Division of Oil, Gas and Geothermal Resources.

Lastly, I, Doug Williams certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of the those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Douglas C. Williams

S & C Oil Inc.